

**CWA/NPDES Approval/Comments Letters of submittals under AO, CDs, etc.**

<b>ROUTING AND TRANSMITTAL SLIP</b>				<b>Date:</b> 8/22/14
<b>TO:</b> (Name, office symbol, room number, building, Agency/Post)			<b>Initials</b>	<b>Date</b>
1. <b>Ammons/Sayre</b> (FL for 8/22/14)			RA	8/22/14
2. <b>White</b>			[Signature]	8/22/14
3. <b>Bush</b> <b>Horseley (Signature)</b>			[Signature]	8/25/14
4. <b>White (Mailing)</b>				
5. <b>Ammons</b>				
6.				
7.				

  

Action	File	Note and Return
X	Approval	For Clearance
	As Requested	For Correction
	Circulate	For Your Information
	Comment	Investigate
	Coordination	Justify

  

<b>From:</b> (Name, org. symbol, Agency/Post)		<b>Room No.—Bldg.</b>
		<b>Phone No.</b>

DO NOT use this form as a RECORD of approvals, concurrences, disapprovals, clearances, and similar actions.

**REMARKS:**  
**Comment letter on Jackson, MS's Savanna Street WWTP CPE (req'd submittal under CD).**

**Electronic Version Saved on:**

T:\I CWEB\Collection Systems\Enf-Comp\MS\Jackson, MS\CD Submittals + Comments\CPE Savanna Street 5-30-2014\CPE SavannaWWTP Comment Letter final.docx

**Route in green folder**





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 4  
ATLANTA FEDERAL CENTER  
61 FORSYTH STREET  
ATLANTA, GEORGIA 30303-8960

**AUG 28 2014**

CERTIFIED MAIL 7010 1060 0002 1705 4099  
RETURN RECEIPT REQUESTED

City of Jackson  
Attn.: The Honorable Tony T. Yarber  
Mayor, City Hall  
219 South President Street  
Jackson, Mississippi 39205

Re: Comprehensive Performance Evaluation Comment Letter  
City of Jackson, Mississippi Consent Decree  
Case No.: 3:12-cv-790 TSL-JMR

Dear Mayor Yarber:

The U.S. Environmental Protection Agency Region 4 has consulted with the Mississippi Department of Environmental Quality (MDEQ) upon reviewing the City of Jackson's (the City) Savanna Street Wastewater Treatment Plant (SSWWTP) Comprehensive Performance Evaluation (CPE) document, dated May 28, 2013, pursuant to Section V. of the subject Consent Decree above, and have the following questions and comments needing clarification:

1. Page 2-1: States, "Additional influent metering stations are to be installed in December 2013 or early 2014..." Also, throughout Section 6, the CPE noted that the "influent sampling location was downstream of the plant's recycle streams resulting in inaccurate influent data." This deficiency was also noted in the EPA's Science and Ecosystem Support Division (SESD) February 22-25, 2010, and April 12-14, 2010, Diagnostic/Performance Inspection Report (the "SESD Report"). Page 24 of the SESD Report states "Influent 24-hours composite samples were collected downstream of screening using an ISCO 3710 automatic sampler." Condition L-6 of the SSWWTP's National Pollutant Discharge Elimination System (NPDES) permit states, "The influent samples must be collected after the combination of all influent waste streams, but prior to influent screening and grit removal." This practice has rendered every Daily Monitoring Report submitted to the MDEQ suspect with regards to percent removal calculations. The EPA and the MDEQ are deeply concerned that the City has continued the practice of inappropriate influent sampling in violation of the NPDES permit. Please provide an update reflecting whether these flow and automatic sampling meters have been installed, or the estimated date of installation along with a brief nomenclature of the meters to be installed, including the flow and automatic samplers to be installed on the West Bank Interceptor, Caney Creek Interceptor and the West Rankin County Utility Authority Force Main.
2. Page 2-2: Has the toppled manhole stack located on the 48-in Lynch Creek Interceptor, described in the first paragraph of this page, that is believed to have collapsed in late 2008, been repaired? If so, please provide a date of repair. If not, please explain why it has not been

repaired along with a plan of action for repair, including a schedule. In addition, please provide a reason why it took the City and/or UWS-MS to figure out that the Lynch Creek interceptor manhole collapsed, when the influent flow spiked in December 2008 and stayed high (i.e. it took over 4.5 years for the City to even recognize the problem).

3. Page 2-2: As annotated in the SESD Report, the flow was not measured continuously with a chart recorder and totalizer, leaving flow measurement increments up to the discretion of the plant operators. In the absence of properly collected flow data, the data set being used from January 2005 to December 10, 2008, is suspect. Please provide amplifying information concerning the validity of the data being used and any concerns with regards to data accuracy.
4. Page 2-2: In addition to the above comment, please explain why the City chose to use older flow data (due to the collapsed manhole on the Lynch Creek Interceptor) from prior to December 10, 2008 for the hydraulic evaluation of the influent pump station (IPS), but used later concentration and loading data (mostly November 2010 – September 2013) for evaluating the loadings to the plant (e.g. Section 6 and Tables 6-6 through 6-16).
5. Section 4.1 states that for the IPS, “the total rated capacity of the IPS is 195 MGD; however, the firm capacity of the station is 95 MGD.” Please provide further detail as to how and why there is so much discrepancy between the rated and firm capacities of the IPS.
6. Section 4.2 emphasizes the electrical system for the influent pump station is “obsolete technology and in need of replacement to prevent pump stoppage due to electrical failure.” The CPE further states that the “HVAC system has been non-operable for many years” and goes on to state the importance of this system in providing protection from heat and humidity for both the electrical and mechanical equipment. These systems have been classified in the CPE as remedial measure Type 3. Given the importance of these systems and the classification of “Reliability of Station Pumps” as Type 2, please provide additional explanation as to why it would not be necessary to classify the HVAC system and electrical system as remedial measure Type 2 so that any pump station upgrades would be afforded the protections of the systems as stated in the CPE. Alternatively, please provide a reasonable (as soon as possible) timeframe past the “two years remediation timeframe of CCP approval for Type 2 remediate” that the HVAC and electrical system will be remediated.
7. Section 4.2 (page 4-3) states that “Outside of the footprint of the station’s structure, both the line coming into the station and the discharge line (force main) which conveys flows to the headworks station of [sic] plant have required point repairs within the last 10 years.” However, no further mention of assessment and/or rehabilitation/repair of these lines is mentioned in the rest of this Section (e.g. Table 4-1). Please provide the age and pipe material(s) of these lines, as well as an explanation as to why the City did not further mention these lines, but doesn’t mention the reliability of the 84” line to the EQ basins.
8. Section 5.2 states that the “...key contributor of the headworks overflows has not yet been confirmed and will be addressed as part of the CCP report.” Please provide an update as to any investigation into the cause/contributors to the overflows at the headworks, as this should have been investigated during the CPE.
9. Section 6.2 (page 6-1) mentions a future sixth secondary clarifier. Please provide a schedule for the construction of this clarifier.

10. Section 6.4 (page 6-3) mentions that the aeration basin diffusers have not been inspected, much less maintained or cleaned of debris since their installation in 1996. Please address this in the WWTP Operations and Maintenance Plan, as the CPE mentions that the WEF MOP 11 recommends an annual inspection and cleaning of debris, as well as the fact that the diffusers are currently operating at 1.5 times the normal design life.
11. Section 6.6 (pages 6-11 through 6-14) shows numerous effluent violations of the NPDES permit for Flow, TSS, CBOD<sub>5</sub>, Total Nitrogen and Total Phosphorus. Has the City paid any penalties to the MDEQ for these effluent limit violations?
12. Section 6.7 (page 6-14) states that the aeration basin designations "...may change upon receiving influent data that does not contain the plant's recycle streams." Does the City have a date certain as to when it will get this data and if so, how much data will the City use to determine if a designation needs to change?
13. Page 6-16: Please explain further why the correction or remediation of non-operational pH, Dissolved Oxygen, Oxygen Reduction Potential, ammonia and aeration basin's air flow meters cannot be accomplished as a Type 2 remediation, given that these meters would be necessary to maximize treatment efficiency and may be a relatively minor expense (cost of installation is not discussed).
14. Section 8.3 (page 8-3) mentions that "...in Mississippi, MDEQ regulations require that all land applied sludge be incorporated into the subsoil (plowed in), which in itself is an acceptable vector attraction reduction option." What if the sludge from the Savanna Street WWTP is hauled to another State?
15. Section 8.4 (page 8-9) fails to mention any limiting factor of the sludge digesters themselves, only the sludge thickeners, dewatering equipment, associated buildings and sludge storage. However, Section 8.3 states that "Provision of more effective sludge stabilization should be addressed as part of the CCP." Please explain why sludge digestion seems to be a concern, but there is no accounting of limiting factors in Section 8.4.
16. Page 10-5: Please explain further why remediation of the Paralleling Equipment is classified as Type 3 and repairing the Transfer Switch as Type 2. Given the importance of the Paralleling Equipment during power outage(s), the EPA and the MDEQ believe that a Type 2 classification may be more appropriate.
17. Section 10.3 (Page 10-5): Please explain why the CPE includes Emergency Generator for Blowers as a performance limiting factor in Table 10-1, but does not include it in the summary for Type 3 remedial measures below the table.
18. Section 11-3 (Page 11-2): The CPE states that "*It was noted that a list of capital improvement items needed for effective plant operations are submitted to the City yearly, but not approved. An annual budget for capital repairs is needed by the City of Jackson to properly fund annual needs as required.*" The EPA and the MDEQ are deeply concerned that the City has continued the funding practices that led to the current conditions of the SSWWTP and the associated WCTS. Please provide a plan of action to address funding concerns (especially capital improvements) stated in the CPE. In addition, please discuss whether or not this funding issue will be addressed in the forthcoming Financing and Cost Analysis Program, required by Paragraph 43 of the Consent Decree.

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19. Section 11.6 (page 11-3): The CPE states that *"Review of the existing operations contract between the city of Jackson and UWS-MS indicated there are few specific operational performance requirements within the contract. The few parameters provided address only basic permit limits at specified flows. Specific requirements like operational parameters to control the use of storm lagoons, what if any discharges can occur from the storm lagoons, and other critical operational parameters are not addressed. In addition, requirements concerning regular maintenance activities are virtually non-existent."* In addition, the CPE adds that *"The current contract also does not address the new permit requirements or any pending changes that will be required by the Consent Decree."* and goes so far as to recommend the City renegotiate and re-procure the contract. Given the above mentioned lack of requirements in the City's contract with UWS-MS, please provide the expiration date of the City's contract, as well as any plans the City may have to re-open, re-negotiate and/or re-procure the current contract, including a schedule.

The EPA will approve the SSWWTP CPE pending a timely and complete response to the above comments. Pursuant to Section V, Paragraph 13 of the Consent Decree, please respond in writing within 30 days of receipt of this letter. If you should have any questions regarding the above comments, please contact Mr. Brad Ammons at (404) 562-9769 or via email at [ammons.brad@epa.gov](mailto:ammons.brad@epa.gov).

Sincerely,



Maurice L. Horsey, IV, Chief  
Municipal & Industrial Enforcement Section  
Clean Water Enforcement Branch

cc: Mr. Les Herrington, P.E.  
Mississippi Department of Environmental Quality

Mr. Terry Williamson  
City of Jackson

Ms. Keisha Powell  
City of Jackson